

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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| DAVID GRENKE, individually, and<br>on behalf of all others similarly situated,<br><br>Plaintiff,<br><br>v.<br><br>HEARST COMMUNICATIONS, INC.,<br>a Delaware Corporation,<br><br>Defendant. | Case No. 12-cv-14221-GCS-MKM<br><br>Hon. George C. Steeh<br><br>[Magistrate Judge Mona K. Majzoub] |
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**JOINT MOTION TO AMEND SCHEDULING ORDER**

Defendant Hearst Communications, Inc. (“Hearst”) and Plaintiff David Grenke (“Plaintiff,” together with Defendant, the “Parties”), by and through their respective counsel hereby move the Court to adjourn the November 21, 2014 deadline for witness lists pending Hearst’s Motions to Stay Discovery and to Dismiss, and state as follows:

1. On September 5, 2014, the Parties jointly moved this Court to extend the September 8, 2014 deadline for the filing of witness lists to November 21, 2014 to engage in further discovery. The Court granted the motion on September 9, 2014.

2. On October 25 and 27, 2014, Hearst respectively filed its Motion to Dismiss Based on Lack of Subject-Matter Jurisdiction, and Motion to Stay

Discovery Pending Decision on Defendant's Motion to Dismiss (hereinafter, the "Motions"). The Court thereafter set hearing dates and briefing schedules for both motions. The current dates for the hearings on each motion are December 8, 2014 (Motion to Stay) and February 11, 2015 (Motion to Dismiss).

3. The Parties are currently briefing the Motions pursuant to the briefing schedules set by the Court.

4. On November 20, 2014, the Parties conferred and agreed that given the pending Motions and the current posture of the action, the November 21, 2014 deadline for the filing of witness lists should, subject to Court approval, be adjourned and rescheduled by the Court following the determination of those pending Motions, if appropriate.

5. The Parties' joint request is supported by good cause. Hearst believes that adjourning the witness list filing deadline will save party and judicial resources in light of one pending motion that is case dispositive and another motion requesting a stay of discovery until the dispositive motion is decided. Plaintiff believes that substantial discovery remains outstanding, including the deposition of Hearst's Rule 30(b)(6) witness, and such discovery will likely identify additional key witnesses for trial.

6. The instant motion is filed in good faith and not for purposes of undue delay or for any improper purpose.

WHEREAS, Defendant Hearst Communications, Inc. and Plaintiff David Grenke respectfully request that the Court enter an Order amending the current schedule to adjourn the November 21, 2014 deadline for filing of witness lists. The Parties request that relief be granted by text-only order.

**Respectfully submitted,**

Dated: November 21, 2014

By: /s/ Kristina E. Findikyan

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Dated: November 21, 2014

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*Counsel for Plaintiff David Grenke*

**CERTIFICATE OF SERVICE**

I, Kristina E. Findikyan, an attorney, certify that on November 21, 2014, I served the above and foregoing Joint Motion to Amend Scheduling Order by causing true and accurate copies of such paper to be filed and transmitted to all counsel of record via the court's CM/ECF electronic filing system.

/s/ Kristina E. Findikyan